



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

December 21, 2007

Reply To: ECL-115

James M. Anderson
DEQ Northwest Region
Portland Harbor Section
2020 SW Fourth Ave, Suite 400
Portland, OR 97201

RE: Source Control Decision
Operable Unit 3, Portland Shipyard
5420 N. Lagoon Ave., Portland, OR
ECSI No. 271

Dear Mr. Anderson:

EPA has reviewed DEQ's Source Control Decision (SCD) Memorandum for Operable Unit 3 (OU3) at the Portland Shipyard site referenced above. Based on the information provided in this document, EPA cannot agree with DEQ's determination that this facility does not appear to be a current source of Willamette River water or sediment contamination. Until the following questions and comments regarding this source control decision are addressed, EPA will consider the Portland Shipyard OU3 site as a potential source of contamination to the Portland Harbor Superfund Site. We provide the following comments for DEQ to consider in proceeding forward with its decisions regarding this site.

General Comments

- 1) It is unknown whether the groundwater pathway is a current source or a potential future source to the Willamette River; however, based on the information presented EPA views this pathway at this site as a low priority for source control.
- 2) Storm water has not been adequately characterized to determine whether or not the storm water pathway is problematic. This pathway is viewed to be a medium priority for source control at this site by EPA.
- 3) Screening at this site was only conducted for Human Health industrial use; the Willamette River is also protected for aquatic life and recreational use so any release to the Willamette River from this site must be evaluated for those receptors as well.
- 4) EPA was not provided with complete or legible evidence; several Figures and/or Tables were omitted and the Aerial Photographs were not readable. This information may have answered some of the questions and/or concerns that we have with this

Site. In the future, please ensure that EPA has legible and complete copies of all referenced materials for source control documents.

Specific Comments

- 1) The No Further Action Determination Request letter from the Port (July 25, 2006) states that “No investigation activities were proposed for this upland area based on its prior development and use history.” EPA does not agree that this statement since there were insufficient fact to support this decision. EPA provides more specific comments below.
- 2) The Port states on Page 2 of the Further Action Determination Request letter from the Port (July 25, 2006) that “A determination as to whether dredge material is a potential source of contamination should only be made after a site-specific evaluation of the fact, and should include an evaluation of historical source information and, if available, sampling results for fill materials dredged from similar sources and placed during the same timeframe.” While EPA is supportive of the information presented for the 1920s fill, there is unsubstantiated evidence for the 1940s fill and this information needs to be provided in order to make an informed decision regarding this site.
- 3) Did DEQ confirm that the oil-water separator was abandoned by filling with concrete?
- 4) Based on information provided in the Phase I and Phase II Environmental Site Assessment, the site has been used for storage of equipment and parking since 1942. These activities could have resulted in the release of contaminants through the storm water pathway (either sheet flow runoff or direct conveyance through storm water lines) to Swan Island Lagoon.
- 5) There have only been two groundwater samples taken at the site and they were located in conjunction with the former UST at the site. These two samples are not sufficient to conclude that there was not a release from the UST or from the fill from the 1940s at the site. It is recommended that further characterization of the groundwater be conducted at this site.
- 6) The Phase I Environmental Site Assessment (p. 2) states that ‘One pad-mounted electrical transformer was observed on the southwestern exterior of the office/warehouse facility. The transformer was labeled “non-polychlorinated biphenyl”’ thus it is unclear why substation M was sampled for PCBs. Further, it is stated in the letter from Ash Creek Associates, Inc. (July 24, 2007) that “The exact size of each former substation is unknown” so the sample spacing for Substation 4 was used as a guide. First, please confirm as to whether substation M is still located on the site. Second, please state rational for sampling Substation M. Lastly, please describe why the sample spacing is adequate to characterize the Substation.
- 7) Phase I Environmental Site Assessment (p. 2) states that storm water exits the property via sheet flow to the east and (p. 6) “The subject property was bounded...to the northeast by a narrow strip of undeveloped Port of Portland-owned land...” The Memo to Jim Anderson (10/17/2007) indicates that the Berths are associated with this property, yet wouldn’t they actually be associated with the adjacent property?

- 8) The No Further Action Determination Request letter from the Port (July 25, 2006) states that "Roof drains from the office/warehouse building drained to a storm water pipeline that runs along N. Lagoon Avenue." Do the roof drains still drain to the storm water pipeline that runs along N. Lagoon Avenue? If so, where is the outfall for this pipeline? If not, where do they currently drain?
- 9) The No Further Action Determination Request letter from the Port (July 25, 2006) states that "Storm water from the adjacent parcel of property is collected by six drains that each discharge to Swan Island Lagoon through small-diameter, steel outfall pipes. The adjacent property houses an asphalt paved parking area and a building that includes Freightliner's wind tunnel." What is the purpose of discussing the adjacent property's storm water discharge?
- 10) Please verify whether or not the paving material from 1972 removed when the site was redeveloped in 1980?
- 11) The Phase I Environmental Site Assessment (p. 9) indicates the 2,000 gallon UST (UST Facility No. 419 on the ODEQ Registered UST list) was installed in February 1980 according to Portland Fire Bureau and decommissioned by removal on October 15, 1987.
- 12) The Phase I Environmental Site Assessment (p. 11) states that a floor drain was noted in the women's restroom. Was a similar drain noted in the men's restroom?
- 13) Mr. Lordos statement in the Phase I Environmental Site Assessment (p. 11) is that "petroleum has never been stored on the property in a single container larger than 660 gallons or in an aggregate of containers (including truck saddle tanks) of over 1,320 gallons. What about the 2,000 gallon UST that stored gasoline from 1980 to 1987?
- 14) Please explain why the Phase I Environmental Site Assessment (p. 11) only reviewed the Oregon State Fire Marshal Surveys for 1996 through 2001 and did not include the period of 1980 through 1995.
- 15) Based on the Aerial Photography Review of the Phase I Environmental Site Assessment Report (p. 14) the property was unused prior to 1936. Some time between 1936 and 1940, the western portion of the property began to be used for automobile parking. Some time between 1940 and 1948, the eastern portion of the property was filled, a commercial building was constructed on the northern portion, and the remainder of the property was used to store equipment or debris. Some time between 1948 and 1955, the building on the northern portion, storage equipment and debris had been removed and the western portion of the property was again used for vehicle parking. A 1963 photo indicated that the property did not appear to be paved and the property was vacated with the exception of a small shed (security building?) on its northeastern portion. This evidence indicates several decades of use and fill prior to the site being paved some time between 1963 and 1972 in which contaminants could have been released on to site soils. Thus, EPA disagrees that using data from other areas of Swan Island are representative of this site.
- 16) The Phase I Environmental Site Assessment Report (p. 17) stated that "Additional filling was conducted in the early 1940s as part of the development of the Kaiser shipyard, which was formerly located to the northwest of the property. The exact origin of the Willamette River dredge spoils used at the subject property was not available." This is further substantiated on p. 14 where it states, "The 1948 aerial photograph indicated that the eastern portion of the subject property appeared to have

been filled to the level of the western portion of the property.” There was no discussion of other areas of Swan Island being filled at this same time; thus, this fill may be unique to this property. Consequently, EPA disagrees that using data from other areas of Swan Island are representative of this site.

- 17) It appears that the Phase II Environmental Assessment Report concluded that the 2,000 gallon UST was in fact removed by providing the evidence of the patch in the asphalt and the sand/concrete fill in the tank pit to 11 ft. bgs (P-1 and P-4), yet that determination was not clearly stated anywhere in the documentation supplied. The Phase I Environmental Site Assessment Report (p.16) states that “...Port of Portland Ship Repair Yard Fire Response Plan...dated September 1988, indicated that a gasoline pump was located on the northwestern exterior of the office/retail facility.” Please confirm that gasoline pump and the UST at the site has been removed.
- 18) The Phase II Environmental Assessment Report (p.8) showed detections of BTEX and concentrations of oil-range petroleum hydrocarbons in sample P-2 above DEQ Soil Matrix Level 2 Cleanup Standard (OAR 340-122-0335), yet no further sampling was conducted to determine the extent of the contamination. Since this sample point is believed to be located between the removed UST and Swan Island lagoon, there may have been a release. Further investigation of this is recommended.
- 19) It is unclear why oil-range petroleum hydrocarbons were detected in sample P-2 when gasoline was stored in the UST unless it is due to weathering of the product. The SCE needs to provide the rationale for this finding.

If you have any questions or would like to discuss the contents of this letter further, please feel free to contact me at (206) 553-6705.

Sincerely,

Kristine M. Koch
Remedial Project Manager

cc: Jennifer Sutter, DEQ-NW
Chip Humphrey, EPA-OOO
Eric Blischke, EPA-OOO